I am submitting comments strongly in favor of HD Radio and of the development of HD Radio's Secondary Audio Channel (SAC) capability. In the Detroit radio market, there are no more full-power FM frequencies available and when one occasionally goes up for sale, the cost is in the tens of millions of dollars. Expanding service to additional facets of our community through acquisition of additional, conventional radio frequencies is not achievable with the resources available to educationally-focused noncommercial radio licensees.

WDET-FM is an "early adopter" of the HD Radio technology, a stance supported by the Corporation for Public Broadcasting's HD Radio Conversion Seed Money Grant Fund. Although the potential for vastly improved audio quality, elimination of distortion, maximization of signal coverage and enhanced customer service through text information delivery held high appeal, our primary reason for migrating to HD Radio technology is the promise of the SAC.

Only two locally owned and controlled full-power FM stations remain in Detroit, MI; noncommercial WDET-FM 101.9 and noncommercial WDTR-FM 90.9 (licensed to the Detroit Public Schools). The disheartening news of WDTR's likely demise is circulating in the press today. It is very difficult for a single station to be "all things to all people" and our colleagues at WDTR may have succumbed to the struggle to train and serve students and develop a significant programming service with audience size capable of donating money to support station operations. Even WDET, at 55 years of continuous operation, struggles to balance the community's need for substantive, noncommercial news and information and its need for a progressive, creative music/arts/cultural outlet. And with only a single programming stream, we can't begin to address the unmet needs in this market of a classical music service, a minority-focused and/or language-specific service or a stream that supports student learning and artistic endeavor.

Public radio is the "keeper of the flame" of the original ideals of broadcasting—as the 2nd Carnegie Commission on Public Broadcasting put it—"...magnificent, electronic extensions of ourselves [that can] teach, heal, and inspire, if we use them not for the ruthless pursuit of the least common denominator but for their highest human potential."

I am counting on the FCC to fully protect public radio's ability to fulfill that mission and, to give us full flexibility through the authorization of SAC to expand and enhance our service, and become more financially independent in the process.